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Attorneys for Second Third-Party Defendant  
John Kim a/k/a Jang H. Kim

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PEI LICENSING, INC.

Plaintiff

- against -

DI-MED INTERNATIONAL INC.; ANGIE'S  
SHOES AND LEATHER GOODS, INC.; JOHN  
DOES 1-10; JANE DOES 1-10; AND XYZ  
COMPANIES 1-10,

Defendants

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF  
NEW YORK  
CIVIL ACTION NO. 11-0153  
(JBW) (RML)

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ANGIE'S SHOES AND LEATHER GOODS,  
INC.

Third Party Plaintiff

- against -

GEOFFREY ALLEN CORPORATION,

Third-Party Defendant

**SECOND THIRD-PARTY  
DEFENDANT, JOHN KIM a/k/a  
JANG H. KIM'S ANSWER TO  
FIRST AMENDED ANSWER TO  
THIRD PARTY COMPLAINT,  
SEPARATE DEFENSES,  
COUNTERCLAIM AND SECOND  
THIRD-PARTY COMPLAINT OF  
THIRD-PARTY DEFENDANT/  
SECOND THIRD-PARTY PLAINTIFF  
GEOFFREY ALLEN CORPORATION**

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GEOFFREY ALLEN CORPORATION,

Second Third-Party Plaintiff,

- against -

JOHN KIM a/k/a JANG H. KIM

Second Third-Party Defendant.

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Second Third-Party Defendant, JOHN KIM a/k/a JANG H. KIM ("KIM") by his attorney,

M. JOSEPH LEVIN P.C. as and for his answer to the Third-Party Complaint, Separate Defenses, Counterclaim and Second Third-Party Complaint of Third-Party Defendant/Second Third-party Plaintiff GEOFFREY ALLEN CORPORATION herein alleges as follows:

1. Denies knowledge and information sufficient to form a belief contained in Paragraphs 5, 6, 12, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 28 and 29 of the Third-Party Complaint, Separate Defenses, Counterclaim and Second Third-Party Complaint of Third-Party Defendant/Second Third-party Plaintiff.
2. Denies each and every allegation contained in Paragraphs 25 and 26 of the Third-Party Complaint, Separate Defenses, Counterclaim and Second Third-Party Complaint of Third-Party Defendant/Second Third-party Plaintiff.
3. Denies each and every allegation contained in Paragraphs 2, 3, 4, 5, 6, 7, 8, 9, 10 and 11 of COUNT ONE of the Third-Party Complaint, Separate Defenses, Counterclaim and Second Third-Party Complaint of Third-Party Defendant/Second Third-party Plaintiff.
4. Denies each and every allegation contained in Paragraphs 16, 17and 18 of COUNT FOUR of the Third-Party Complaint, Separate Defenses, Counterclaim and Second Third-Party Complaint of Third-Party Defendant/Second Third-party Plaintiff.
5. Denies each and every allegation contained in Paragraphs 20, 21 and 22 of COUNT FIVE of the Third-Party Complaint, Separate Defenses, Counterclaim and Second Third-Party Complaint of Third-Party Defendant/Second Third-party Plaintiff.
6. Denies each and every allegation contained in Paragraphs 23, 24 and 25 of COUNT SIX of the Third-Party Complaint, Separate Defenses, Counterclaim and Second Third-Party Complaint of Third-Party Defendant/Second Third-party Plaintiff.

7. Denies knowledge and information sufficient to form a belief contained in Paragraphs 27, 28, 30, 31and 32 of COUNT SEVEN of the Third-Party Complaint, Separate Defenses, Counterclaim and Second Third-Party Complaint of Third-Party Defendant/Second Third-party Plaintiff.

8. Denies each and every allegation contained in Paragraphs 29 of COUNT EIGHT of the Third-Party Complaint, Separate Defenses, Counterclaim and Second Third-Party Complaint of Third-Party Defendant/Second Third-party Plaintiff.

**WHEREFORE**, Second Third-Party Defendant , JOHN KIM a/k/a JANG H. KIM demands judgment dismissing COUNT ONE - EIGHT of the Third-Party Complaint, Separate Defenses, Counterclaim and Second Third-Party Complaint of Third-Party Defendant/Second Third-party Plaintiff together with interest costs and disbursement of this action.

CERTIFICATION

I hereby certify that Second Third-Party Defendant, JOHN KIM a/k/a JANG H. KIM is not currently aware of any pending or contemplated action or arbitration involving the subject matter of this action.

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John Kim a/k/a Jang H. Kim

By

M. Joseph Levin  
ID# 4333

Dated: September 12, 2013